

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
WEI CHU WANG  
on behalf of himself  
and others similarly situated,

09-CV-10454 (AKH) (RLE)

**DECLARATION OF  
CHEUK FU**

Plaintiff,

-against-

SING TAO NEWSPAPERS NEW YORK LTD.  
and ROBIN MUI,

Defendants.  
----- x

I, Cheuk Fu, declare:

1. I am the Accounting Manager for Sing Tao Newspapers New York Ltd. In this capacity, I am familiar with the compensation of the newspaper's advertising salespeople. In addition, I have reviewed the payroll and compensation records of Wei Chu Wang.

2. Advertising salespeople at Sing Tao receive compensation in the form of a base salary, and commissions. In addition, they may receive compensation in the form of bonuses, paid vacation, 401k employer match, and/or a medical allowance.

3. Mr. Wang received compensation in the form of all of the above.

4. In 2006, the total compensation paid to Mr. Wang was \$39,591.04. In 2007, the total compensation paid to Mr. Wang was \$42,765.86. In 2008, the total compensation paid to Mr. Wang was \$39,632.93 through August 2008 (Mr. Wang's employment was terminated in August 2008).

5. Mr. Wang was subject to an Income Execution for monies owed to a Judgment Creditor by which Sing Tao was required to remit 10% of the judgment debtor's gross salary, wages or earnings to the City of New York Marshal. The Income Execution sent to the paper by

the City of New York Marshal dated February 28, 2006 stated that the total Judgment Amount due was \$12,343.14 plus interest owed from August 2, 2004. Sing Tao complied with this Income Execution.

6. After his employment was terminated, Mr. Wang was paid for all commissions owed to him, as well as accrued vacation and severance pay.

7. The total compensation earned by an advertising salesperson in a given year varies based upon his/her base salary, commissions earned, bonus, and other forms of compensation received, such as paid vacation, 401k employer match, and/or a medical allowance. An advertising salesperson may earn over \$200,000 total compensation in a given year.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 22, 2010, in New York, New York.

  
\_\_\_\_\_  
CHEUK FU